Synthetic Minor Versus Title V Permits

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Synthetic Minor Permit Benefits

- Compliance Assurance Monitoring (CAM) avoidance
- Fewer permit conditions governing operations
- No annual compliance certification required

Synthetic Minor Permit Benefits

- No semiannual monitoring report required
- No responsible official certification required
- Tend to be beneficial for facilities that have few changes

Synthetic Minor Permit Drawbacks

- Slow revision process (public notice in most states)
- Lack of operational flexibility
- Continual Facility-Wide Tracking of small amount of pollutant additions
- State-dependent circumstances

Title V Permit Benefits

- Fast and/or no revision process needed to accommodate operational changes
- Operational flexibility
- Lower costs of administration
- Less onerous application requirements

Conclusions

- Facilities that need to change quickly should consider a title V permit
- Facilities that are steady-state or reducing operations would most likely benefit from a synthetic minor permit
- Questions/comments?